

# SEALED

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
AT LYNCHBURG  
FEBRUARY 2018 SESSION

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

FEB 28 2018

JULIA C. DURLEY, LEXIS  
BY: DEPUTY CLERK  
*Hawkins*

UNITED STATES OF AMERICA	)	<b>INDICTMENT</b>
v.	)	Criminal No. <u>18CR0003</u>
CHRISTOPHER CHARLES COLLINS	)	18 U.S.C. §§ 1470; 2252(a)(4)(B);
a/k/a "NavyGuy4Yng"	)	and 2252(b)(2)

**COUNT ONE**

The Grand Jury charges:

That in or about November 2016, in the Western Judicial District of Virginia and elsewhere, the defendant, CHRISTOPHER CHARLES COLLINS, a/k/a "NavyGuy4Yng," did by using a means or facility of interstate or foreign commerce, knowingly attempt to transfer obscene material to another individual who he believed had not attained the age of 16 years.

All in violation of Title 18, United States Code, Section 1470.

**COUNT TWO**

The Grand Jury further charges:

That on or about February 7, 2017, in the Western Judicial District of Virginia, the defendant, CHRISTOPHER CHARLES COLLINS, a/k/a "NavyGuy4Yng," did knowingly possess a matter which contained a visual depiction(s) that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and

transported in and affecting interstate and foreign commerce, and that was produced using materials which had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce, including by computer, and the production of such visual depiction(s) involved the use of a minor engaging in sexually explicit conduct, and such visual depiction(s) was of such conduct, and further that at least one depiction involved a minor who had not attained 12 years of age.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**NOTICE OF FORFEITURE**

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendant shall forfeit to the United States:
  - a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of law, pursuant to 18 U.S.C. § 2253(a)(1).
  - b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to 18 U.S.C. § 2253(a)(2).
  - c. any property, real or personal, used or intended to be used to commit or to promote the commission of said violation of law, or any property traceable to such property, pursuant to 18 U.S.C. § 2253(a)(3).
  - d. Any obscene material described in 18 U.S.C. § 1470 and any property, real or personal, used or intended to be used to commit or to promote the commission of a violation of 18 U.S.C. § 1470, pursuant to 18 U.S.C. § 1467.
2. The property to be forfeited to the United States includes but is not limited to the following property:

2. The property to be forfeited to the United States includes but is not limited to the following property:

- a. All such material containing the above-described visual depictions.
- b. One (1) Motorola Moto G smartphone, SN: ZY222V3G7B;
- c. One (1) HP ProtectSmart laptop computer, SN: 5CD4281TRB.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL, this 28 day of February, 2018.

s/ Foreperson  
GRAND JURY FOREPERSON

for   
RICK A. MOUNTCASTLE  
UNITED STATES ATTORNEY